UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA – NORTHERN DIVISION

DREW J. RIBAR,
Plaintiff, Pro Se,
v.
WASHOE COUNTY, et al.,
Defendants.

Case No. 3:24-cv-00526-ART-CSD

PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO FILE REPLY IN SUPPORT OF MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT

AND REQUEST FOR EXPEDITED CONSIDERATION

Plaintiff Drew J. Ribar, appearing in propria persona, hereby respectfully moves under **Federal Rule of Civil Procedure 6(b)(1)(A)** for a 14-day extension of time—from **April 9, 2025**, to **April 23, 2025**—to file his reply to Defendant Build Our Center's Opposition [ECF No. 74] to Plaintiff's Motion for Leave to File First Amended Complaint [ECF No. 65]. Plaintiff further requests expedited consideration of this Motion given the imminent reply deadline.

I. GOOD CAUSE EXISTS

On **March 19, 2025**, Plaintiff was involved in a motor vehicle accident in which he was rear-ended by a commercial semi-truck operated by J.B. Hunt. On **March 20, 2025**, he sought

emergency medical care and was diagnosed with injuries including whiplash and persistent left shoulder pain. (See **Exhibit A – Emergency Room Records**.)

Plaintiff is currently under the care of Dr. Vinson Christenson, who has referred him for diagnostic imaging, including X-rays scheduled for **April 16, 2025**, at Reno Diagnostic Centers. (See **Exhibit B – Referral Documentation**.)

As a result of these injuries, Plaintiff experiences severe pain while seated and is significantly impaired in his ability to perform tasks essential to litigation, including reading, researching, and preparing court filings. Without an extension, Plaintiff will be unable to adequately prepare his reply by the current deadline of **April 9, 2025** as calculated under **Local Rule 7-2(b)**.

II. REQUEST FOR EXPEDITED CONSIDERATION

In light of the rapidly approaching deadline, Plaintiff respectfully requests the Court rule on this Motion by or before **April 9, 2025**, or in the alternative, grant a temporary extension pending the Court's ruling.

III. NO PREJUDICE TO DEFENDANTS

This short extension will not prejudice Defendants. The case remains in the pretrial phase, and no discovery or dispositive deadlines will be impacted. The requested relief is made in good faith and not for purposes of delay.

IV. CONCLUSION

For the foregoing reasons, Plaintiff respectfully requests that the Court:

1. Extend the reply deadline from April 9, 2025, to **April 23, 2025**;
2. Grant expedited consideration or enter a temporary order pending decision; and
3. Grant such further relief as the Court deems just and appropriate.

DATED: April 8, 2025

Respectfully submitted,

/s/ Drew J. Ribar

Drew J. Ribar

3480 Pershing Lane

Washoe Valley, NV 89704

const2audit@gmail.com

(775) 223-7899

CERTIFICATE OF SERVICE

I certify that on April 8, 2025, I caused a true and correct copy of the foregoing **Motion for Extension of Time**, including all supporting exhibits, to be served by the methods listed below pursuant to **FRCP 5(b)(2)** and **Local Rule 5-1**:

Via Email and U.S. Mail:

Counsel for Washoe County Defendants

Lindsay L. Liddell, Esq.

Andrew Cobi Burnett, Esq.

Office of the Washoe County District Attorney

One South Sierra Street

Reno, NV 89501

Email: lliddell@da.washoecounty.gov

Email: cburnett@da.washoecounty.gov

Counsel for Build Our Center, Inc.

Jerry C. Carter, Esq.

Alison R. Kertis, Esq.

Sierra Crest Business Law Group

6770 S. McCarran Blvd.

Reno, NV 89509

Email: jcarter@sierracrestlaw.com

Email: akertis@sierracrestlaw.com

Executed on April 8, 2025.

/s/ Drew J. Ribar

Drew J. Ribar

DECLARATION OF DREW J. RIBAR IN SUPPORT OF MOTION FOR EXTENSION OF TIME

I, Drew J. Ribar, declare as follows:

1. I am the Plaintiff in this action, proceeding pro se.
2. On March 19, 2025, I was rear-ended by a semi-truck. The following day I went to the emergency room and was diagnosed with injuries that make sitting for long periods, reading legal materials, and preparing legal filings difficult.
3. I am under ongoing medical care, including a scheduled imaging appointment on April 16, 2025.
4. Due to this, I am unable to timely complete my reply brief currently due April 9, 2025, and respectfully request an extension of 14 days.
5. I have not conferred with opposing counsel due to the time-sensitive nature of this filing, but I make this request in good faith and not for the purpose of delay.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 8, 2025.

/s/ Drew J. Ribar

Drew J. Ribar

[PROPOSED] ORDER

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA – NORTHERN DIVISION

DREW J. RIBAR,
Plaintiff,
v.
WASHOE COUNTY, et al.,
Defendants.

Case No. 3:24-cv-00526-ART-CSD

ORDER GRANTING PLAINTIFF'S MOTION FOR EXTENSION OF TIME

Having considered Plaintiff's Motion for Extension of Time to File Reply and good cause appearing:

IT IS HEREBY ORDERED that:

Plaintiff's Motion is **GRANTED**.
Plaintiff shall have until **April 23, 2025**, to file his reply to Defendant Build Our Center's Opposition [ECF No. 74].

DATED: _____

UNITED STATES DISTRICT JUDGE

EXHIBIT A

Emergency Room Records

Date of Visit: March 20, 2025
Facility: Carson Tahoe Health – Emergency Department
Purpose: Medical documentation of injuries sustained in motor vehicle accident on March 19, 2025, including diagnosis of musculoskeletal pain, whiplash, and restricted mobility.

Submitted in support of:
Plaintiff's Motion for Extension of Time to File Reply
Case No. 3:24-cv-00526-ART-CSD
U.S. District Court, District of Nevada

Submitted by:
Drew J. Ribar
Plaintiff, Pro Se

AFTER VISIT SUMMARY

CARSON TAHOE HEALTH

Drew J. Ribar MRN: 23403226 3/20/2025 Carson Tahoe Emergency Department 775-445-8733

Instructions

Alternate ibuprofen 600 mg with 500-1000 mg of Tylenol every 4 hours for pain or discomfort.
Take cyclobenzaprine which is a muscle relaxer prior to bed.
May apply topical 4% lidocaine gel to affected areas as discussed. This is over-the-counter and can be purchased at the pharmacy.
Ice for the 1st 48 hours then alternate heat and ice.
Consider follow-up with Physical therapy or chiropractor for the whiplash symptoms. Call to set up an appointment.
Follow-up with your primary care provider.
Please return to the emergency department with any significant worsening of symptoms.

Your medications have changed

START taking:
cyclobenzaprine (FLEXERIL)

Review your updated medication list below.

Read the attached information

1. Whiplash (English)
2. Arthralgia (English)
3. Contusion, Shoulder (English)
4. Motor Vehicle Accident- General Precautions (English)

Pick up these medications at WALGREENS DRUG STORE #02662 - RENO, NV - 12645 S VIRGINIA ST AT SWC OF VIRGINIA & ARROW CREEK PARKW

cyclobenzaprine

Address: 12645 S VIRGINIA ST, RENO NV 89511-4803
Phone: 775-853-9887

What's Next

You currently have no upcoming appointments scheduled.

Allergies

No Known Allergies

Today's Visit

You were seen by STEVEN R MINER

Reason for Visit
Motor Vehicle Accident

Diagnoses

- Whiplash injury to neck, initial encounter
- Acute pain of left shoulder
- Left arm pain
- Motor vehicle collision, initial encounter

Blood Pressure	Temperature (Tympanic)
134/78	98.6 °F
Pulse	**Respiration**
79	18
Oxygen Saturation	
96%	

MYCHART

MyChart gives you online access to send messages to your health care team, view test results, schedule appointments and more.
Go to **mychart.carsontahoe.com**, click "Activate My Account", and enter your personal activation code:
C3RK9-PW6CW-8SR8Z
Expires: 5/19/2025 11:41 AM

MyChart Support: 775-445-6403

988

988 offers free, confidential support, and resources, provided by trained crisis counselors 24/7. If you, or someone you know, are experiencing emotional distress, crisis, or thoughts of suicide, please call or text the Suicide and Crisis Lifeline at 988.

Your Medication List

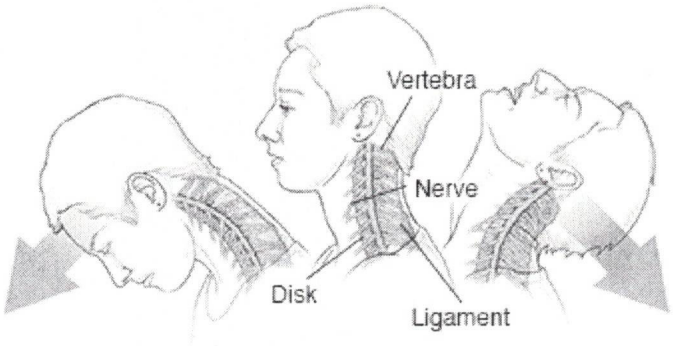
START

cyclobenzaprine 10 mg tablet
Commonly known as: FLEXERIL

Take 1 tablet (10 mg) by mouth daily at bedtime.

Whiplash

When one car hits another, each person's body is thrown toward the impact, then away from it. This is whiplash. Even at slow speeds, the force puts stress and strain on the spine. This is especially true for the neck. The weight of the head stretches and damages muscles and ligaments. It may pull spinal bones out of line. The bones that protect your spinal cord (vertebrae) can be forced out of position. Disks are the spine's shock absorbers. They can bulge, rupture, or wear down. Nerves can get pinched or inflamed. And muscles and ligaments can be stretched or torn.



Symptoms of whiplash

A wide array of symptoms can follow an auto accident. Symptoms may appear right away. Or they may be delayed for several days. Symptoms may include:

- Pain, especially in your neck, shoulder, arm, or lower back
- Arm or leg numbness
- Stiffness
- Headache
- Dizziness

Treating whiplash

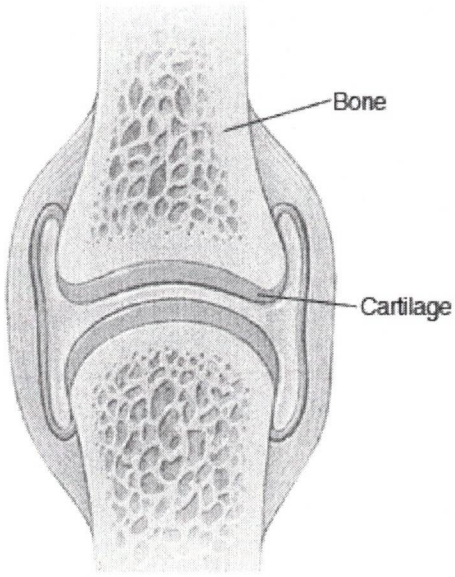
You may be asked to do one or more of the following:

- Ice the injured area for 24 to 48 hours. Do this for 20 minutes. Repeat 5 times a day.
- After 48 hours, put moist heat on the injured area for 20 minutes. Repeat 5 times a day.
- Wear a cervical (neck) collar for as long as recommended.
- Take nonsteroidal anti-inflammatory drugs (NSAIDs) or muscle relaxants as directed by your healthcare provider.
- Call your healthcare provider if you have numbness or weakness in your limbs. This can be a sign of nerve injury.

StayWell last reviewed this educational content on 4/1/2024

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Arthralgia



Arthralgia is the term for pain in or around the joint. It is a symptom, not a disease. This pain may affect 1 or more joints. In some cases, the pain moves from joint to joint.

There are many causes for joint pain. These include:

- Injury
- Wearing out the joint surface (osteoarthritis)
- Inflammation of the joint because of crystals in the joint fluid (gout)
- Infection inside the joint
- Inflammation of the fluid-filled sacs around the joint (bursitis)
- Autoimmune disorders, such as rheumatoid arthritis or lupus
- Inflammation of chords that attach muscle to bone (tendonitis)

Home care

- Rest the affected joints until your symptoms improve.
- Eat a healthy diet, exercise as advised by your healthcare provider, and stay at a healthy weight
- You may be prescribed pain medicine. If none is prescribed, you may use acetaminophen or ibuprofen to control pain and inflammation.

Follow-up care

Follow up with your healthcare provider or as advised.

When to get medical care

Call your healthcare provider right away if any of these occur:

- Pain, swelling, or redness of joint increases
- Pain that gets worse or comes back after some improvement

- Pain moves to other joints
- You can't bear weight on the affected joint
- You can't move the affected joint
- Joint looks deformed
- New rash appears
- Fever of 100.4°F (38°C) or higher, or as advised by your provider
- New symptoms appear

StayWell last reviewed this educational content on 5/1/2022

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Shoulder Bruise

You have a shoulder bruise (contusion). This causes pain, swelling, and sometimes bruising on the skin. You don't have any broken bones. This injury will take from a few days to several weeks to heal, depending on how severe it is. Moderate to severe shoulder bruises are treated with a sling or shoulder immobilizer. Minor bruises can be treated without any special support.

Home care

Follow these tips when caring for yourself at home:

- If you were given a sling to use, leave it in place for the time advised by your healthcare provider. If you aren't sure how long to wear it, ask for advice. If the sling becomes loose, adjust it so that your forearm is parallel with the ground. Your shoulder should feel well supported.
- Put an ice pack on the injured area for 20 minutes every 1 to 2 hours the first day. You can make your own ice pack by putting ice cubes in a plastic bag. Wrap the bag in a thin towel. Continue with ice packs 3 to 4 times a day for the next 2 days. Then use the pack as needed to ease pain and swelling.
- You may use acetaminophen or ibuprofen to control pain, unless another pain medicine was prescribed. If you have chronic liver or kidney disease, talk with your healthcare provider before using these medicines. Also talk with your provider if you've ever had a stomach ulcer or digestive bleeding.
- Shoulder and elbow joints become stiff if left in a sling for too long. You should start range of motion exercises about 7 to 10 days after the injury. Talk with your provider to find out what type of exercises to do and how soon to start.
- Unless your provider told you otherwise, you can take the sling off to shower or bathe.

Follow-up care

Follow up with your healthcare provider if you don't start getting better in the next 5 days.

When to seek medical advice

Call your healthcare provider right away if any of the following occur:

- Pain or swelling gets worse or continues for more than a few days
- Large amount of bruising on your shoulder or upper arm
- Your hand or fingers become cold, blue, numb, or tingly
- Trouble moving your hand or fingers
- Weakness in your hand or fingers
- Your shoulder becomes stiff
- Your shoulder feels like it's popping out
- You aren't able to do your daily activities

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Motor Vehicle Accident: General Precautions

Strong forces may be involved in a car accident. It's important to watch for any new symptoms that may signal hidden injury.

It's normal to feel sore and tight in your muscles and back the next day, and not just the muscles you injured. Remember, all the parts of your body are connected. So while at first one area hurts, the next day another may hurt. Injuries cause inflammation. This then causes the muscles to tighten up and hurt more. After the pain at first gets worse, pain should slowly improve over the next few days. But report more severe pain to your health care provider.

Even without a definite head injury, you can still get a concussion from your head suddenly jerking forward, backward, or sideways. Concussions and even bleeding can still occur, especially if you've had a recent injury, take a blood thinner, or are over age 65. It's common to have a mild headache and feel tired, nauseated, or dizzy. Know what warning signs of concussion to report to your provider.

A motor vehicle accident, even a minor one, can be very stressful and cause emotional or mental symptoms after the event. These may include:

- A general sense of anxiety and fear.
- Recurring thoughts or nightmares about the accident.
- Trouble sleeping or changes in appetite.
- Feeling depressed, sad, or low in energy.
- Being irritable or easily upset.
- Feeling the need to stay away from activities, places, or people that remind you of the accident.

In most cases, these are normal reactions and are not severe enough to get in the way of your normal activities. These feelings often go away in a few days, or sometimes after a few weeks. Talk with your health care provider if they last longer, get worse, or disrupt your daily life.

Home care

Muscle pain, sprains, and strains

Even if you have no visible injury, it's not unusual to be sore all over and have new aches and pains the first couple of days after an accident. Take it easy at first, and don't overdo it.

- At first, don't try to stretch out the sore spots. If there is a strain, stretching may make it worse.
- You can use an ice pack or cold compress on the sore spots for up to 20 minutes at a time, as often as you feel comfortable. This may help reduce the inflammation, swelling, and pain. To make an ice pack, put ice cubes in a plastic bag that seals at the top. Wrap the bag in a clean, thin towel or cloth. Don't put ice directly on your skin.
- After the inflammation and pain go away, you may be left with stiffness. If this is the case, you can use a heating pad, especially on your low back.

Wound care

- If you have any scrapes or abrasions, they often heal in about 10 days. It is important to keep the abrasions clean while they first start to heal. Follow wound care instructions from your health care provider. Watch for early signs of infection such as:
  - Increasing redness, warmth, or swelling around the wound.
  - Fever.
  - Red streaks around the wound.

- Draining pus.

Medicines

- Talk to your health care provider before taking new medicines, including over-the-counter products, especially if you have other medical problems or are taking other medicines.
- If you need anything for pain, you can take acetaminophen or ibuprofen, unless you were given a different pain medicine to use. Ibuprofen is a good anti-inflammatory that can help with these types of injuries. Talk with your provider before using these medicines if you have medicine allergies or chronic liver or kidney disease, or if you ever had a stomach ulcer or gastrointestinal bleeding, or if you are taking blood thinner medicines. Always follow your health care provider's instructions.
- Be careful if you are given prescription pain medicines, narcotics, or medicine for muscle spasm. They can make you sleepy and dizzy and can affect your coordination, reflexes, and judgment. Don't drive or do work where you can injure yourself when taking them.

Follow-up care

Follow up with your health care provider, or as advised. If emotional or mental symptoms get worse or don't go away, follow up with your provider as soon as you can. You may have a more serious traumatic stress reaction. There are treatments that can help.

If X-rays or CT scans were done, you'll be told if the results show any concerns that affect your treatment.

Call 911

Call 911 if you have:

- Trouble breathing.
- One eye pupil that's larger than the other.
- Repeated vomiting.
- A headache that gets worse or doesn't go away.
- Restlessness or agitation.
- Confusion, drowsiness, or trouble waking up.
- Fainting, loss of consciousness, convulsions, or seizures.
- A fast heart rate.
- Trouble with speech or sight.
- Trouble walking, loss of balance, numbness or weakness in one side of your body, or a facial droop.

When to get medical advice

Call your health care provider right away if you have:

- Pain in your neck, back, belly (abdomen), arm, or leg that is new or gets worse.
- Redness, swelling, or pus coming from any wound.
- Mental or emotional symptoms that don't get better or that get worse.

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EXHIBIT B

Medical Referral for X-rays

Referring Physician: Dr. Vinson Christenson
Referral Date: March–April 2025
Facility: Reno Diagnostic Centers
Purpose: Referral for X-rays and additional imaging for injuries sustained in March 19, 2025 vehicle collision.

Submitted in support of:
Plaintiff's Motion for Extension of Time to File Reply
Case No. 3:24-cv-00526-ART-CSD
U.S. District Court, District of Nevada

Submitted by:
Drew J. Ribar
Plaintiff, Pro Se

Reno Diagnostic Centers

When it has to be done right.

Centralized Scheduling
FAX (775) 353-2776
Phone (775) 323-5083

Exam Date/Time:	Patient Name:	Date of Birth:
	Ribar, Drew	5-9-68

Patient Home/Work/Cell Number:	Patient Email:
775-223-7899	Drewribar@Gmail.com

Exam #1 Requested: C-SPINE X-RAY 7 VIEW AP, LAT, FLEX, EXT. OBLIQUES APOM

CONTRAST: ☐ W/ ☐ W/O ☐ W/ & W/O

☐ LEFT ☐ RIGHT ☐ BILATERAL

Radiologist may modify CT or MRI use of contrast media based on patient's history.
☐ No, radiologist may not change exam protocol unless new written or verbal order is obtained.

Reason for Exam #1 (signs/symptoms - no R/O diagnosis): S13.4XXA

ICD-10 Code:

Exam #2 Requested: T-SPINE X-RAY AP, LAT., SWIMMERS

CONTRAST: ☐ W/ ☐ W/O ☐ W/ & W/O

☐ LEFT ☐ RIGHT ☐ BILATERAL

Radiologist may modify CT or MRI use of contrast media based on patient's history.
☐ No, radiologist may not change exam protocol unless new written or verbal order is obtained.

Reason for Exam #2 (signs/symptoms - no R/O diagnosis): S29.012A

ICD-10 Code:

Additional Exam(s)/Notes: EXAM #3 L-SPINE X-RAY, AP, LAT, FLEX, & EXT. HAVE AP VIEW BE A LUMBOPELVIC VIEW S39.012A

Pregnant? ☐ Yes ☐ No

Reno Diagnostic Centers Offers:

Comprehensive Women's Services:
- ☐ Mammogram-Screening
  - ☐ *(If dense breast tissue, then Whole Breast Ultrasound)*
- ☐ Mammogram-Diagnostic *(w/ Ultrasound if indicated)*
- ☐ 3D Mammogram-Tomosynthesis
- ☐ Whole Breast Ultrasound Screening *(for women with dense breasts)*
- ☐ Stereotactic Biopsies

X-ray
Walk-in x-rays are accepted, however, patients are strongly encouraged to schedule to minimize wait time.

Ultrasound
Pelvic:
- ☐ Transabdominal
- ☐ Transvaginal
- ☐ Both Transabdominal & Transvaginal *(if indicated)*

3T Wide Bore MRI
1.5T Wide Bore MRI
64-Slice CT
Coronary CT
Nuclear Medicine
Gastric Emptying (Tougas Protocol)
Myocardial Perfusion Imaging (Lexiscan)
PET/CT
Digital Fluoroscopy
DEXA - Bone Density Testing
Echocardiogram (including Pediatrics)
Body Fat Analysis
☐ BUN/Creatinine Testing *(if needed for contrast)*

☐ **Normal**	☐ **Expedited**	☐ **STAT**
Report will be faxed within 24 hours.*	Report will be faxed within 4 hours.*	Report will be called within 2 hours.*
Provider fax number:	**Provider fax number:**	**Provider cell phone:**

* *Except for after hours, weekends, and holidays.*

All images are immediately available online at www.RenoDiagnosticCenters.com

Referring Offices: Please call 775-336-5549 for access.

Send To:

Send Images On: ☐ CD ☐ Paper ☐ Patient to hand carry

Previous Images Located:

Name of Health Plan:	ID #:	Authorization #:
		RDC cannot obtain authorization for same day or STAT exams.

Referring Provider Signature:	Referring Provider Name & Address:	Today's Date:
Vivian Christensen DC		4-2-25

Please bring this requisition with you.

Please check location.
**See back for maps.*

☐ **Downtown Reno**
590 Eureka Ave.
Reno, NV 89512

☐ **Southwest Reno**
625 Sierra Rose Dr.
Reno, NV 89511